217/782-2113

"REVISED
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT [1]

PERMITTEE

Color Communications, Inc.
Attn: Steve Winter
4000 West Fillmore Street
Chicago, Illinois 60624-3916

Application No.: 95090040 I.D. No.: 031600BGU
Applicant's Designation: Date Received: February 26, 1998
Operation of: Paper Coating and Printing
Date Issued: November 1, 1999 Expiration Date[2]: November 1, 2004
Source Location: 4000 and 4242 West Fillmore Street, Chicago, Cook County
Responsible Official: Steve Winter, Executive Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE a paper coating and printing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: January 8, 2003
Revision Date Issued: TO BE DETERMINED
Purpose of Revision: Minor Modification

This minor modification contains revision to production limits established in Condition 7.3.6 for flexographic printing lines ##4 and 5 without increase of allowable VOM emissions.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this minor modification. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued on June 25, 2001 is incorporated herein by reference.

Please attach a copy of this minor modification and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this, please call Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:jar

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Color Communications, Inc.
4000/4011/4242 West Fillmore Street
Chicago, Illinois 60624-3916
773/638-1400

I.D. No.: 031600BGU
Standard Industrial Classification: 2672 and 2759, Paper Coating and Printing

1.2 Owner/Parent Company

Color Communications, Inc.
4000 West Fillmore Street
Chicago, Illinois 60624-3916

1.3 Operator

Color Communications, Inc.
4000 West Fillmore Street
Chicago, Illinois 60624-3916

Contact Person's Name:
Tom Gorman
773/638-1400

1.4 General Source Description of Source

Color Communication, Inc. is located at 4000/4011/4242 West Fillmore Street in Chicago and produces color boards. The color board production consists of the paper/film coating and printing lines.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft	feet
ft^3	cubic foot
G	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
HP	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
lb	pound
LEL	Lower Explosive Limit
m	meter
MACT	Maximum Achievable Control Technology
MBtu	Million Btu
Mg	milligrams
mmHg	millimeters of mercury
mmscf	million standard cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NO_x	Nitrogen Oxides
PIMW	Potentially Infectious Medical Wastes
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute

RMP	Risk Management Plan
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
wt.	weight
Yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Color Matching Draw Down Machines
Spray Booth (R and D Department)
Latex Coating Mixers
Laminator
Color Matching of Latex

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 MBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 MBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons provided that the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act [35 IAC 201.210(a)(10)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In

particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Six Coating Lines with Natural Gas-Fired Ovens (See Section 7.5 for Ovens) Date of Construction: Line #1 – 1993 Line #2 – 2001, Routed to an Afterburner in 2001 Line #3 - 1959, Routed to an Afterburner in 1994 Line #4 - 1985 Line #5 - 1999 Line #6 - 1999	Permanent Total Enclosure and Catalytic Oxidizer (For Lines 2 & 3)
Group 2	Lithographic Printing Lines	Line #1 (5-Color Komori Press) Line #2 (2-Color Heidelberg Press) Line#3 (1-Color Miehle Press) Date of Construction: #1 - 1997 #2 - 1989 #3 - 1989	None
Group 3	Flexographic Printing Lines	Two Flexographic Lines (#4 and #5) Date of Construction: #4 - 1989 #5 - 1997	None
Group 4	Lacquer Color Matching Operations	No Emission Unit Associated with these Operations Date of Construction: N/A	None
Group 5	Natural Gas-Fired Combustion Emission Units	Four Boilers (Nos. 1, 2, 4, 5) Three Ovens (Associated with Coating Lines Nos. 1, 3, 4)	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP's emissions.

5.1.1 This CAAPP permit is issued based on the aggregation of two production sites located at 4000 and 4242 West Fillmore Street, Chicago, and historically treated by the Illinois EPA as a two separate sources with I.D. 031600BGU and 031600FSJ.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emissions of including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minutes period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

5.2.3. The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4. Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5. Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	125.27
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	1.55
Nitrogen Oxides (NO_x)	26.55
HAP, not included in VOM or PM	---
Total	153.37

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emissions for HAP as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b) (10) of the CAA.

5.6 General Recordkeeping Requirements

5.6.1 Emission records

The Permittee shall keep and maintain records of total emissions on a calendar year basis for the equipment covered by unit-specific conditions (Section 7) to demonstrate compliance with Condition 5.5.1.

5.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous year.

5.7.2 The Permittee shall promptly notify the Illinois EPA if the emissions exceed the limits in Condition 5.5.1 and appropriate Unit-Specific Conditions of Section 7.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). A source may also transfer or sell the ATUs that it holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.

i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

a. The source shall apply to the Illinois EPA, and obtain a Transaction Account prior to conducting any market transactions, pursuant to 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation to the Illinois EPA in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.650, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:

i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and

ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 391 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 44.3979 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units.

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

None

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs from the allotment as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs from the allotment to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emission Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusion from Further Reduction

a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reduction requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Natural gas-fired boilers and ovens (Group 5 of this permit)

b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reduction requirements specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Coating Lines

7.1.1 Description

Six flow coating lines (4242 West Fillmore) apply latex and/or lacquer coating to paper and film substrate in the production of color boards.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Six Coating Lines with Natural Gas-Fired Ovens (See Section 7.5 for Ovens) Date of Construction: Line #1 – 1993 Line #2 – 2001, Routed to an Afterburner in 2001 Line #3 - 1959, Routed to an Afterburner in 1994 Line #4 - 1985 Line #5 - 1999 Line #6 - 1999	Permanent Total Enclosure and Catalytic Oxidizer (for Lines #2 and #3)

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected coating line" for the purpose of these unit specific conditions is a paper coating operation that includes a coater operated either in the permanent total enclosure and controlled by the catalytic oxidizer or without VOM reduction system.

b. All affected coating lines at the source should either comply with the application of compliant coating as established by 35 IAC 218.204 (c) for paper coating or with a daily-weighted average VOM content limitations, as allowed by 35 IAC 218.205 (a). The following limitations are established for VOM content in paper coating:

i. 35 IAC 218.204 (c)

A. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds

the following emission limitations. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

kg/l	lb/gal
0.28	2.3

B. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

ii. 35 IAC 218.205(a)

For paper coating operations the daily-weighted average VOM content shall not exceed 0.28 kg VOM/l (2.3 lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day.

c. Affected coating lines Nos. 2 and 3 are subject to 35 IAC 218.207(b)(1), which requires that the coating line be equipped with a capture system and control device that provides 81% reduction in the overall emissions of VOM and the control device is at least 90% efficient.

d. The affected coating line #3 is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 1) [35 IAC 212.322(a)].

e. The affected coating lines Nos. 1, 2, 4, 5, and 6 are subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of

particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

Coating operations performed on each affected coating line and subject to limitations of 35 IAC 218.204 are not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes coating operations of the affected coating line from this requirement.

7.1.5 Operational and Production Limits and Work Practices

a. The catalytic oxidizer shall be in operation at all times that the associated coating lines Nos. 2 and 3 are in operation and applying non-compliant coating which exceeds the limits established by 35 IAC 218.204 (c) and 35 IAC 218.205(a). The afterburner shall not be seasonally shut down as would be allowed in 35 IAC 218.107.

b. The permanent total enclosure and afterburner control system shall be operated in a manner consistent to good air pollution control practices and operating requirements established in 35 IAC 218, Appendix B, Procedure T "Criteria for and Verification of a Permanent or Temporary Total Enclosure".

c. The Permittee shall, in accordance with manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance of the catalytic oxidizer such that oxidizer be kept in proper working condition and not cause violation of the Environmental Protection Act or regulations promulgated therein.

d. The Permittee shall replace the catalyst as needed in order to maintain the minimum required VOM destruction efficiency of 90% of the afterburner, pursuant to 35 IAC 218.207(h)(2).

e. This permit is issued based on the affective coating lines #2 and #3 with an afterburner not being allowed to operate during malfunction or breakdown of an afterburner because the Permittee did not submit the proof to the Illinois EPA that such continued operation is necessary to prevent injury to persons or severe damage to equipment, or that such continued

operation is required to provide essential services, pursuant to 35 IAC 201.262.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected coating lines are subject to the following:

a. Emissions and operation of the coating line #5 shall not exceed the following limits:

Lacquer Coating Usage		Average VOM Content	VOM Emissions	
(gal/mo)	(gal/yr)	(lb/gal)	(T/mo)	(T/yr)
125	1,000	4.82	0.3	2.50

The above limitations were established in Construction Permit 00080079, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. Emissions and operation of the coating line #6 shall not exceed the following limits:

Lacquer and Latex Coating Usage		VOM Emissions	
(gal/mo)	(gal/yr)	(T/mo)	(T/yr)
125	1,250	0.14	1.44

The above limitations were established in Construction Permit 98040025, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. These limits are based on the maximum operating rate and daily-weighted average VOM content of applied coating equal to 2.3 lb/gal.

c. Emissions and operation of the coating line #4 shall not exceed the following limits:

Total VOM Usage		VOM Emissions	
(T/mo)	(T/yr)	(T/mo)	(T/yr)
3.65	25.50	3.65	25.50

The above limitations were established in Construction Permit 00080079, pursuant to 35 IAC Part 203.The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. These limits are based on the maximum operating rate and daily-weighted average VOM content of applied coating equal to 2.3 lb/gal.

d. Emissions and operation of the coating line #1 shall not exceed the following limits:

Total VOM Usage (T/mo)	(T/yr)	VOM Emissions (T/mo)	(T/yr)
1.36	10.00	1.36	10.00

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected coating line #1 below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N]. These limits are based on the maximum operating rate and application of coatings complying with Condition 7.1.3(b)(i) or (ii) of this permit.

e. Emissions and operation of coating line #2 shall not exceed the following limits:

Lacquer Coating (gal/mo)	(gal/yr)	Average VOM Content (lbs/VOM per gal)	VOM Emissions (T/mo)	(T/yr)
33,500	200,000	4.82	0.8	4.82

Latex Coating (gal/mo)	(gal/yr)			
Less Water				
10,500	63,316	1.99 (Less Water)	0.11	0.63

Latex Coating (gal/mo)	Latex Coating (gal/yr)	Average VOM Content (lbs/VOM per gal)	VOM Emissions (T/mo)	VOM Emissions (T/yr)
With Water				
33,500	201,000		____	____
		Totals:	0.91	5.45

The above limitations were established in Construction Permit 00080079, pursuant to 35 IAC Part 203.The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

f. Emissions and operation of Coating Line #3 shall not exceed the following limits:

Lacquer Coating (gal/mo)	Lacquer Coating (gal/yr)	Average VOM Content (lbs/VOM per gal)	VOM Emissions (T/mo)	VOM Emissions (T/yr)
25,000	161,180	4.82	0.6	3.9

Latex Coating (gal/mo)	Latex Coating (gal/yr)			
Less Water				
30,000	40,200	1.99 (Less Water)	0.30	0.4
With Water				
95,240	127,620		____	___
		Totals:	0.90	4.3

The above limitations were established in Construction Permit 00080079, pursuant to 35 IAC Part 203.The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.1.7 Testing Requirements

a. Within 90 days of initial startup of a coater on line #2, tests shall be performed that will allow evaluation of compliance of the paper coating operations with 35 IAC 218.207(b)(1).

b. The test shall be designed to measure both the destruction efficiency across the afterburner and the overall control efficiency provided by the combination of the capture system and destruction efficiency of the afterburner.

c. The Procedure T shall be used to determine whether a permanent total enclosures meet the criteria of total enclosure, as described in 35 Ill. Adm. Code, Part 218, Appendix B.

d. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A and 40 CFR 61, Appendix B for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Volatile Organic Material	USEPA Method 25 or 25A

e. This test shall be conducted during circumstances which are representative of maximum emissions, and equipment data and material usage during the test shall be measured.

f. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

g. Copies of the Final Report (s) for these tests shall be submitted to the Illinois EPA within 14 days after the test results are compiled and finalized.

h. The Final Report shall include as a minimum:

i. A summary of results.

ii. General information.

iii. Description of test method (s), including description of sampling points, sampling train, analysis equipment, and test schedule.

iv. Detailed description of test conditions, including:

A. Process information, i.e., mode (s) of operation, process rate, e.g. fuel or raw material consumption;

B. Control equipment information, i.e., equipment condition and operating parameters during testing; and

C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.

v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

vi. An explanation of any discrepancies among individual tests or anomalous data.

i. Submittals of information shall be made as follows:

i. Notices of Test - one copy to the Regional Office and one copy to Compliance Section.

ii. Final Report - one copy to the Regional Office and one copy to Compliance Section.

j. Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d),(e) and (f) to measure the overall control and performance of the afterburner controlling all affected coating lines. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.

k. Testing for VOM content of coatings and other VOM containing materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

i. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on affected coating

lines shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9 directly reflect the application of such material and separately account for any additions of solvent.

7.1.8 Monitoring Requirements

Pursuant to 35 IAC 218.105(d)(2)(A)(ii), the catalytic afterburner shall be equipped with a USEPA approved continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. This monitoring equipment shall monitor the temperature across each catalytic bed or VOM concentration of exhaust.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Pursuant to 35 IAC 218.211(e)(2), the Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source:

i. Control device monitoring data;

ii. A log of operating time for the capture system, catalytic afterburner, monitoring equipment and the associated coating line; and

iii. A maintenance log for the capture system, catalytic afterburner and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

b. The Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

i. The coating usage (gal/mo and gal/yr).

ii. The VOM content of each coating applied, % by wt.

iii. Density of each coating applied, lb/gal.

iv. Cleanup solvent usage (gal/mo and gal/yr) and the density of each solvent applied (lb/gal).

v. Records of the testing of VOM and HAP content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:

A. Identification of material tested;

B. Results of analysis;

C. Documentation of analysis methodology; and

D. Person performing analysis.

vi. The VOM emissions in tons/month and tons/year from each affected coating line and calculated based on the compliance procedures from Condition 7.1.12.

vii. Total VOM and HAP emissions in tons/month and tons/year from all affected coating lines calculated based on the recordkeeping requirements and compliance procedures established in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Pursuant to 35 IAC 218.211(e)(3), the Permittee shall notify the Illinois EPA in the following instances:

a. Any record showing violation of 35 IAC 218.207 and Condition 7.1.3(b) within 30 days of such an occurrence; and

b. At least 30 calendar days before changing the method of compliance from 35 IAC 218.207 to 35 IAC 218.204 or 205, the Permittee shall comply with all requirements of 35 IAC 218.211(c)(1) and (d)(1).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coating and clean-up solvents on the affected coating lines with various VOM contents provided that the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance with Condition 7.1.3(b).

7.1.12 Compliance Procedures

a. Compliance of an affected coating lines with the source wide emission limitations in Condition 5.5.1 and emission limitations established in Condition 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the following equation:

i. Uncontrolled VOM Emissions:

A. VOM Emissions from Coating Operation (EI), T/mo and T/yr = Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %);

B. VOM Emissions from Cleanup Operation (EII), T/mo and T/yr = (Actual Clean-up Solvent Usage (gal/mo) x Solvent Density (lb/gal); and

C. Total VOM Emissions (T/mo and T/yr) = EI + EII.

ii. VOM Emissions after Control

A. VOM Emissions from Coating Operation (EI), T/mo and T/yr = [Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %)] x [(100 - destruction efficiency, %)/100 x (capture efficiency, %)/100)];

B. VOM Emissions from Cleanup Operation (EII), T/mo and T/yr = (Actual Clean-up Solvent Usage (gal/mo) x Solvent Density (lb/gal) x [(100 - destruction

efficiency, %)/100 x (capture efficiency, %)/100)]; and

C. Total VOM Emissions (T/mo and T/yr) = EI + EII.

b. Compliance of affected coating lines with VOM emission limitations in Condition 7.1.3(b)(i) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing or by use of the formula listed below:

VOM Coating Content = V x D/[1 - W x D]

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i/d_i)$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal

and the summation $\sum$ is applied over water and all exempt compounds i in the coating.

c. Compliance of the affected coating line with VOM emission limitations in Condition 7.1.3(b)(ii) shall be based on the recordkeeping requirements in Condition 7.1.9 and by use the following equation, as defined in 35 IAC 211.1670:

$$VOM_W = [\sum_{i=1}^{n} V_i\ C_i]/V_T$$

Where:

VOM_w = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM);

n = The number of different coatings as applied each day on a coating line;

V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal);

C_i = The VOM content of each coating as applied each day on a coating booth in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and

V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

d. Compliance with the overall control efficiency requirement under Condition 7.1.3(c) shall be based on the latest measurement of destruction efficiency of the catalytic oxidizer controlling coating lines, and the latest verification test of the permanent total enclosure.

e. Compliance with the particulate matter limitations of Condition 7.1.3(d) and (e) is assured and achieved by the work practices inherent in operation of the affected coating lines.

7.2 Group 2: Sheet-Fed Offset Lithographic Printing Lines

7.2.1 Description

The substrate for lithographic printing is unpainted sheets of paper.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Sheet-Fed Offset Lithographic Printing Lines	Line #1 (5-Color Komori Press) Line #2 (2-Color Heidelberg Press) Line#3 (1-Color Miehle Press) Date of Construction: #1 - 1997 #2 - 1989 #3 - 1989	None

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected lithographic printing line" for the purpose of these unit specific conditions is a sheet-fed offset lithographic printing press which is used for printing on the paper substrate.

b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into atmosphere from each affected lithographic printing line unless non-photochemically reactive materials are used [35 IAC 218.301].

c. Coating/varnish operation performed on the affected lithographic printing lines at the source is subject to limitations of 35 IAC 218.204(c) for paper coating, which provides that:

i. No owner or operator shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to paper and paper products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM), as applied:

kg/l	lb/gal
0.28	2.3

ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

d. Each affected lithographic printing line is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.2.4 Non-Applicability of Regulations of Concern

a. The affected lithographic printing lines are not subject to 35 IAC 218.407 through 218.410 because the combined emissions of VOM from all lithographic printing lines (including solvents used for cleanup operations associated with the lithographic printing) before capture and control never exceed 45.5 kg/day (100 lbs/day), determined in accordance with 35 IAC 218.411(a)(1)(B) [35 IAC 218.405(d)(2)].

b. If total VOM emissions from affected lithographic printing lines exceed 100 lbs/day before capture and control, these lines become subject to limitations of 35 IAC 218.407, and affected lithographic printing lines at the source are always subject to the applicable provisions of Subpart H [35 IAC 218.405(e)].

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

a. Total actual VOM emissions from all printing activities associated with affected lithographic printing lines at this source shall not exceed 100 lbs/day. Compliance with this limit should be demonstrated through appropriate recordkeeping requirements in Condition 7.2.9(a) and compliance procedures of Condition 7.2.12(a).

b. Emissions of VOM and operation of the affected lithographic printing lines shall not exceed the following limits:

i. Printing Line #1

Material	Usage (gal/mo)	Usage (gal/yr)	VOM Content (lb/gal)	VOM Emissions (T/mo)	VOM Emissions (T/yr)
Inks	4,194	25,166	2.40	0.25	1.51
Varnishes	334	2,000	1.8	0.3	1.8
Fountain Solution	500	3,000	0.07	0.02	0.11
Cleanup Solvents	580	3,500	3.77	1.09	6.6
			Total:	1.66	10.02

The above limitations contain revisions to previously issued Construction Permit 97120039, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, allowable ink usage being increased without any increase of VOM emissions. These new limits reflect 95% retention for coldset inks used on the printing line #1 [T1R]. Compliance with annual limits shall be determined from a running total of 12 months of data.

ii. Printing Lines #2 and #3 (Combined)

Material	Usage (gal/mo)	Usage (gal/yr)	VOM Content (lb/gal)	VOM Emissions (T/mo)	VOM Emissions (T/yr)
Inks	500	3,000	2.40	60	0.18
Varnishes	9	50	1.8	16.2	0.05
Fountain Solution	17	100	0.07	1.2	0.01

(Cont.)

Material	Usage (gal/mo)	Usage (gal/yr)	VOM Content (lb/gal)	VOM Emissions (T/mo)	VOM Emissions (T/yr)
Cleanup Solvents	17	100	0.68	11.3	0.04
			Total:	88.7	0.28

The above limitations contain revisions to previously issued Construction Permit 97120039, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, allowable ink usage being increased without any increase of VOM emissions. These new limits reflect 95% retention for coldset inks used on the printing lines #2 and #3 [T1R]. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.2.7 Testing Requirements

For purposes of verifying compliance with VOM emission limits established in Conditions 5.5.1 and 7.2.6 of this permit, the following testing procedures are established:

a. Upon request from the Illinois EPA or USEPA, testing of the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, inks, and varnish shall be conducted, as follows:

i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or

ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, inks and varnish may be

used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a), provided, however, Method 24 shall be used to determine compliance.

b. Upon request from the Illinois EPA or USEPA the percent concentration of solvent in the VOM containing waste from affected lithographic printing lines shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall collect and record either of the following data identified in Conditions 7.2.9(a)(i) and 7.2.9(a)(ii) for all affected printing lines which are exempted from limitations of 35 IAC 218.407 pursuant to 35 IAC 218.411(2):

i. Standard recordkeeping, including the following:

A. The name and identification of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;

B. A daily record which shows whether a lithographic printing line at the source was in operation on that day;

C. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;

D. The total VOM emissions from all lithographic printing lines each month determined as the sum of the product of usage and VOM content for each fountain

solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the printing lines; and

E. The VOM emissions in lbs/day for the month, calculated in accordance with 35 IAC 218.411 (a)(1)(B).

ii. Purchase and inventory recordkeeping, including the following:

A. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;

B. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;

C. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;

D. A daily record which shows whether a lithographic printing line at the source was in operation on that day;

E. The total VOM emissions from all lithographic printing lines each month determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to 35 IAC 218.411(a)(2)(B)(i), B(ii), and B(iii); and

F. The VOM emissions in lbs/day for the month, calculated in accordance with 35 IAC 218.411 (a)(1)(B).

b. For the purposes of verifying compliance with the limits contained in Conditions 5.5.1 and 7.2.6 of this permit, the Permittee shall collect and record

the following information on affected lithographic printing lines subject to these limitations:

i. Monthly usage of each ink, fountain solution, cleaning solution, and varnish (lb/month);

ii. The VOM content (wt. %) of each ink, fountain solution, cleaning solution, and varnish used and accompanied by a copy of the supporting information (e.g., supplier data sheet or laboratory analysis report);

iii. The amount of manifested waste generated or solvents reclaimed on the affected lithographic printing lines in units gal/month and gal/year;

iv. The average density lb/gal and wt.% of VOM in the manifested waste or reclaimed solvents; and

v. VOM emissions for printing line #1 and printing lines #2 and #3 calculated in accordance with procedures given in Condition 7.2.12 for the current month plus preceding 11 months.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. The Permittee shall notify the Illinois EPA in writing if the combined emissions of VOM from all affected lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with a lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event; and

b. The Permittee shall notify the Illinois EPA in writing if the production and or emission limitations contained in Condition 7.2.6 are exceeded, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of inks, varnishes, fountain solution, and clean-up solvents on affected lithographic printing lines with various VOM contents, provided that the Permittee continues to comply with the emission limitations in Conditions 5.5.1 and 7.2.6 of this permit.

7.2.12 Compliance Procedures

Compliance of the affected printing lines with emission limitations of this permit shall be based on the recordkeeping requirements of Condition 7.2.9 and the following emission factors and formulas listed below:

a. Compliance with a daily VOM emission limitations (less than 100 lbs/day of total VOM emissions before capture and control) shall be determined based on the following:

    i. To calculate total daily emissions of VOM, the Permittee shall determine the monthly emissions of VOM from all affected lithographic printing lines at the source (including solvents used for cleanup operations associated with lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation;

    ii. To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks to account for VOM retention in the substrate; and

    iii. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing lines at the source, no retention factor is used.

b. Compliance of the affected printing lines with VOM content emission limitation in Condition 7.2.3(c) for

applied varnish shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of equations listed below:

VOM Coating Content = V x D/[1 - W x D]

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$W = \Sigma (w_i/d_i)$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal

and the summation Σ is applied over water and all exempt compounds i in the coating.

c. Compliance with annual VOM emission limits in Conditions 5.5.1 and 7.2.6(b) shall be determined by using the emission factors and formulas listed below:

i. The Permittee may presume 95% retention of coldset ink VOM in substrate, as stated in 35 IAC 218.411(a)(1)(B)(iii);

ii. VOM Emissions from Ink = VOM Ink Usage x 0.05;

iii. VOM Emissions from Fountain Solution = VOM Fountain Solution Usage;

iv. VOM Emissions from Cleaning Solution = VOM Cleaning Solution Usage;

v. VOM Emissions from Varnish = Varnish Usage x VOM Content (wt. %); and

vi. Total VOM Emissions = Aggregation of ii through v.

7.3 Group 3: Flexographic Printing Lines

7.3.1 Description

Flexographic printing is performed on rolls of web from 6 to 16 inches in width. The web is fed to the presses at a nominal rate of 200 ft. Per minute. Either an alcohol-based ink or UV based ink is utilize.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Flexographic Printing Lines	Two Flexographic Lines (#4 and #5) Date of Construction: #4 - 1989 #5 - 1997	None

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected flexographic printing line" for the purpose of these unit-specific conditions is a printing operation that includes flexographic printing press which is used to apply inks to the paper.

b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into atmosphere from each affected flexographic printing line unless non-photochemically reactive materials are used [35 IAC 218.301].

c. Each affected flexographic printing line is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.3.4 Non-Applicability of Regulations of Concern

a. Affected flexographic printing lines (including solvents used for cleanup operations associated with flexographic printing line(s)) are exempted from the limitations of 35 IAC 218.401 because maximum

theoretical emissions and potential to emit of VOM are less than 100 t/year and 25 t/year, respectively, from all affected flexographic printing lines [35 IAC 218.402(a)].

b. Affected flexographic printing lines are not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the flexographic and rotogravure printing, 40 CFR 63 Subpart KK, because these lines are not major for HAP emissions.

7.3.5 Operational and Production Limits and Work Practices

None

7.3.6 Emission Limitations

Total combined emissions and operations of the flexographic printing lines #4 and #5 shall not exceed the following limits:

a. Material Usage shall not exceed the following limits:

Material	Usage (gal/mo)	Usage (gal/yr)
Inks/Varnishes	41	230
Cleanup Solutions (Partial VOM)	40	230
Cleanup Solvents	37	230

b. Total VOM emissions shall not exceed 535 lb/month and 1.6 ton/yr.

The above limitations contain revisions to previously issued Permit 97120039. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, material usage being decreased and VOM content limits being drop without increase of total VOM emissions [T1R]. Compliance with annual limits

shall be determined from a running total of 12 months of data.

7.3.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM content of specific inks, varnishes, thinners, and cleaning solvents applied on the affected printing lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedure of 35 IAC 218.105(a).

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

a. The Permittee shall collect and record all of the following information each year for each printing line pursuant to 35 IAC 218.404(b)(2):

i. The name and identification number of each ink as applied on each printing line; and

ii. The VOM content and the volume of each ink as applied each year on each printing line.

b. The Permittee shall collect and record all of the following information for affected printing lines for verifying compliance with the limits contained in Condition 7.3.6:

i. Usage of each ink/varnish, cleaning solvents, and any other VOM containing materials on a monthly and annual basis in terms of pounds per month and tons per year;

ii. The VOM content of each ink/varnish, cleaning solvent, and any other VOM containing materials used in terms of % VOM by weight and accompanied by a copy of supporting information, e.g., supplier data sheet or laboratory analysis report; and

iii. Total VOM emissions from each affected printing line, calculated in accordance with procedure given in Condition 7.3.12, on a monthly and annual basis in terms of tons per month and tons per year.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. The Permittee shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all flexographic printing lines exceed 100 t/year in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.

b. The Permittee shall notify the Illinois EPA in writing if the production and or emission limitations contained in Condition 7.3.6 are exceeded, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected flexographic printing lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of inks/varnishes or cleaning solvents at these lines with various VOM contents provided that the source wide emission limitations in Condition 5.5.1 and emission limitations in Condition 7.3.6 are not exceeded and the affected lines remain in compliance with Condition 7.3.3(b).

7.3.12 Compliance Procedures

Compliance with the emission limits of Conditions 5.5.1 and 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and calculated based on the following:

Ink VOM Emissions = Ink/Varnish Usage x VOM Content (wt. %)

Cleaning Solvent VOM Emissions = Cleaning Solvent Consumption

Total VOM Emissions = Ink/Varnish VOM Emissions + Cleaning Solvent VOM Emissions

7.4 Group 4: Lacquer Color Matching Operations

7.4.1 Description

Thousands different colors are formulated to match customer's needs during a year. This process includes both computer and manual matching of colors and often involves 10 to 25 iterations of adding color pigments to arrive at the exact color match. The thinning of lacquer is generally done in color matching as the proper viscosity has an important bearing on the correct color. Color matching of latex paints is not included in this operation.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Lacquer Color Matching Operations	No Emission Unit Associated with these Operations Date of Construction: N/A	None

7.4.3 Applicability Provisions and Applicable Regulations

a. An "affected color matching operations" for the purpose of these unit-specific conditions is an operation designed to match customer's needs during a year prior to application on the coating lines.

b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into atmosphere from color matching operations unless non-photochemically reactive materials are used [35 IAC 218.301].

c. Affected color matching operations are subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.4.4 Non-Applicability of Regulations of Concern

Affected color matching operations are exempted from the requirements of 35 IAC Part 218, Subpart TT "Other Emission Units" because maximum theoretical emissions and potential to emit of VOM are limited to less than 25 t/year by Condition 7.4.6 of this permit [35 IAC 218.980(a) and (b)].

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

Total combined emissions of the affected lacquer color matching operations shall not exceed the following limits:

Lacquer Colors Matched		VOM Usage	VOM Emissions	
(Colors/mo)	(Colors/yr)	(lb VOM/Color)	(T/mo)	(T/yr)
2,500	25,000	0.96	1.2	12.0

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the potential emissions of VOM from color matching operations below the levels that would trigger applicability of these rules along with 35 IAC Part 218, Subpart TT, consistent with the information provided in the CAAPP application [T1N]. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) and calculated based on the compliance procedures in Condition 7.4.12.

7.4.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM content of specific inks, coatings, thinners, and other VOM containing materials shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedure of 35 IAC 218.105(a).

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall collect and record all of the following information for affected color matching operations for verifying compliance with the limits contained in Condition 7.4.6:

i. Amount of processed matched colors per month and per year;

ii. The VOM usage for each processed match color; and

iii. Total VOM emissions from affected color matching operations, calculated in accordance with procedure given in Condition 7.4.12, on a monthly and annual basis in terms of tons per month and tons per year.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

The Permittee shall notify the Illinois EPA in writing if the production and or emission limitations contained in Conditions 7.4.3(b) and 7.4.6 are exceeded, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected color matching operations without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of inks, coatings, and other VOM containing materials for color matching operations with various VOM contents provided that the source wide emission limitations in Condition 5.5.1 and limitations in Condition 7.4.6 are not exceeded and the affected color matching operations remain in compliance with Condition 7.4.3(b).

7.4.12 Compliance Procedures

Compliance with the emission limits of Conditions 5.5.1 and 7.4.6 shall be based on the recordkeeping requirements in Condition 7.4.9 and calculated based on the following:

VOM Emissions = Lacquer Colors Matched x VOM Usage/Color

7.5 Group 5: Natural Gas-Fired Combustion Emission Units

7.5.1 Description

Natural gas-fired ovens are used to thermally dry coatings. Natural gas-fired boilers are used to produce steam and comfort heating at this source.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 5	Natural Gas-Fired Combustion Emission Units	Four Boilers (Nos. 1, 2, 4, and 5) Three Ovens (Associated with Coating Lines Nos. 1, 3, and 4)	None

7.5.3 Applicability Provisions and Applicable Regulations

An "affected combustion emission unit" for the purpose of these unit specific conditions is either a natural gas-fired boiler which is used to produce steam or comfort heating at the source or a natural gas-fired oven used to thermally dry coatings.

7.5.4 Non-Applicability of Regulations of Concern

a. Affected natural gas-fired combustion emission unit is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of each unit is less than 73.2 MW (250 MBtu/hr).

b. Affected natural gas-fired combustion emission unit is not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, because the actual heat input from each unit is less than 2.9 MW (10 MBtu/hr).

c. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

Total emissions and operation of all affected combustion emission units shall not exceed the following limits:

Natural Gas Usage		NO_x Emissions	
(mmscf/mo)	(mmscf/yr)	(T/mo)	(T/yr)
100.0	490.0	5.0	24.5

The above limitations were established in Construction Permit #95020065, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for affected combustion units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

Total natural gas usage, in terms of scf /month (or therms/month) and scf/year (or therms/year).

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.5.6 of this permit shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

Maximum heating capacity < 100 MBtu/hr for each fuel combustion unit:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after July 8, 1999 unless the permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use on an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Divisions of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA - Air Branch

United States EPA (AR - 17J)
Air & Radiation Branch (Illinois - Indiana)
77 W. Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I Provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in the permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of the permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi)]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of the permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, operations regulated or required under the permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or this Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Section 39.5(7)(e)(ii) of the Act]

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

a. The certification shall include the identification of each term or condition of the permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications must be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operation logs, or other relevant evidence:

i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a

detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in the permit.

b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless the permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

The permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

The permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that the permit contains a material mistake or inaccurate statement

when establishing the emission standards or limitations, or other terms or conditions of the permit; and

d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if the permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(l) and (n) of the Act]

10.0 ATTACHMENTS

10.1 Attachment 1 - Allowable Emissions of Particulate Matter

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

Where:

P = Process weight rate;
E = Allowable emission rate; and,

i. For process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.1.2 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A(P)^{B}$$

Where:

P = Process weight rate;
E = Allowable emission rate; and,

i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60

45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.2 Attachment 2 – Netting Table

Proposed Emissions from Lines 1 through 6 (Year 2001):		VOM Tons/Year
Line #1	(no PTE; complies by daily-weighted-average)	10.00
Line #2	(new coating line)	5.45
Line #3		4.30
Line #4	(no PTE; complies by daily-weighted-average)	25.50
Line #5		2.50
Line #6		1.44
		49.19

Past Actual Emissions (Average from 1998 and 1999:	VOM Tons/Year
Line #1	5.20
Line #3	0.55
Line #4	9.72
Lines #5 and 6	9.85
	25.32

Net Increase = Proposed Emissions - Past Actual Emissions

= 49.19 - 25.32

= 23.87 Tons/year

10.3 Attachment 3 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

AB:jar